



Carolina Power & Light Company

APR 27 1990

SERIAL: NLS-90-096
TSC 84TSB08

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
PRIMARY CONTAINMENT ISOLATION SYSTEM
(NRC TAC NOS. 67991/67992)

Gentlemen:

By letter dated February 19, 1988 (NLS-88-051), as supplemented by letters dated September 20, 1989 (NLS-89-194), December 5, 1989 (NLS-89-316), and February 15, 1990 (NLS-90-033). Carolina Power & Light Company proposed revisions to the Technical Specifications for the Brunswick Steam Electric Plant, Units 1 and 2. These changes included (1) revisions to correctly reflect the installed instrumentation providing initiation signals to the containment isolation system and (2) relocation of the primary and secondary containment isolation valve listings (Technical Specification Tables 3.6.3-1 and 3.6.5.2-1) from the Technical Specifications to plant procedures.

Subsequently, during telephone discussions with the NRR Project Manager on April 4, 1990, the Staff expressed reservations concerning the proposed change to relocate the primary/secondary containment isolation valve listings to plant procedures, stating that relocation of the valve listing should await approval of the valve table removal from the Technical Specifications as a BWR Owners' Group Technical Specification line-item improvement. Previous discussions with the Staff relative to the relocation of the valve listing had indicated that the proposed change was acceptable to the Staff.

The Company believes that relocation of the primary/secondary containment isolation valve listings to plant procedures represents an acceptable alternative to providing this information in the Technical Specifications. Overall, this change is administrative in nature. The use of 10 CFR 50.59 provides assurance that future changes to the containment isolation valve listings will be properly evaluated for safety impact and that any unreviewed safety questions that may be identified will be forwarded for prior Commission approval. The NRC has concurred with these conclusions through their approval of similar relocation changes. Specific examples of these previous NRC approvals include License Amendments 94 and 76 dated April 28, 1989 for Duke Power Company's McGuire Nuclear Station, Units 1 and 2; Amendment 28 for Northeast Utilities' Millstone Unit 3; and the full power Technical Specifications for the Shearon Harris Plant, Unit 1.

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Based on the precedent established by the previous NRC approvals, as well as the use of established regulatory controls (i.e., 10 CFR 50.59) and plant administrative controls for assuring adequate evaluation of proposed changes to the valve listings for potential safety concerns, the Company believes NRC approval of the relocation of the containment isolation valve listings to plant procedures is appropriate. It should be noted that relocation of the containment isolation valve listings to plant procedures will help avoid the future expenditure of NRC Staff resources for the review and processing of license amendment requests which are typically administrative changes to these listings.

As previously discussed with the NRR Project Manager, the proposed changes to the containment isolation system instrumentation were predicated on the relocation of the primary and secondary containment isolation valve listings to plant procedures and the incorporation of additional changes to these listings at that time. Should the final NRC Staff position be that relocation of this information is not appropriate, an additional supplement to the existing license amendment request will be required before NRC approval and issuance is possible.

Please refer any questions regarding this submittal to Mr. W. R. Murray at (919) 546-4661.

Yours very truly,



Leonard I. Loflin
Manager
Nuclear Licensing Section

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